

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

DISPLAY TECHNOLOGIES, LLC,	§	
	§	
Plaintiff,	§	Case No:
	§	
vs.	§	PATENT CASE
	§	
JAGUAR LAND ROVER NORTH	§	
AMERICA, LLC	§	
	§	
Defendant.	§	
_____	§	

COMPLAINT

Plaintiff Display Technologies, LLC (“Plaintiff” or “Display”) files this Complaint against Jaguar Land Rover North America, LLC (“Defendant” or “Jaguar”) for infringement of United States Patent No. 9,300,723 (the “ ‘723 Patent”).

PARTIES AND JURISDICTION

1. This is an action for patent infringement under Title 35 of the United States Code. Plaintiff is seeking injunctive relief as well as damages.

2. Jurisdiction is proper in this Court pursuant to 28 U.S.C. §§ 1331 (Federal Question) and 1338(a) (Patents) because this is a civil action for patent infringement arising under the United States patent statutes.

3. Plaintiff is a Texas limited liability company with a place of business at 1801 NE 123rd Street, Suite 314, North Miami, FL 33161.

4. On information and belief, Defendant is a Delaware limited liability company with a principal office address of 100 Jaguar Land Rover Way, Mahwah, NJ 07495. On information and belief, Defendant may be served through its agent, Corporation Service

Company, 251 Little Falls Dr., Wilmington, DE 19808.

5. This Court has personal jurisdiction over Defendant because Defendant has committed, and continues to commit, acts of infringement in this District, has conducted business in this District, and/or has engaged in continuous and systematic activities in this District.

6. Upon information and belief, Defendant's instrumentalities that are alleged herein to infringe were and continue to be used, imported, offered for sale, and/or sold in this District.

VENUE

7. On information and belief, venue is proper in this District under 28 U.S.C. § 1400(b) because Defendant is deemed to be a resident of this District.

COUNT I **(INFRINGEMENT OF UNITED STATES PATENT NO. 9,300,723)**

8. Plaintiff incorporates paragraphs 1 through 7 herein by reference.

9. This cause of action arises under the patent laws of the United States and, in particular, under 35 U.S.C. §§ 271, *et seq.*

10. Plaintiff is the owner by assignment of the '723 Patent with sole rights to enforce the '723 Patent and sue infringers.

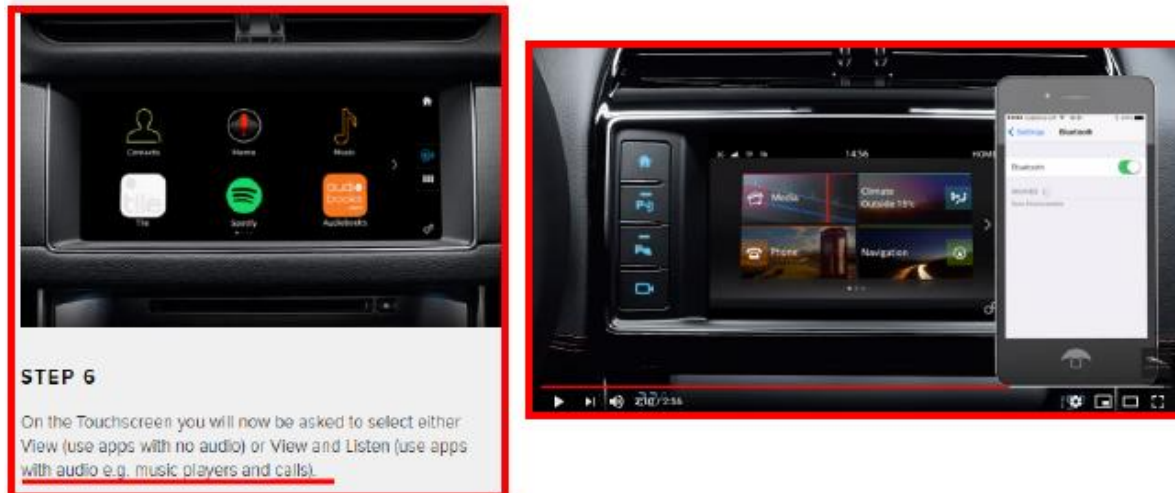
11. A copy of the '723 Patent, titled "Enabling social interactive wireless communications," is attached hereto as Exhibit A.

12. The '723 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

13. Defendant has infringed and continues to infringe one or more claims, including at least Claim 12 of the '723 Patent by making, using, and/or selling media systems covered by

one or more claims of the '723 Patent. For example, Defendant makes, uses, and/or sells the Jaguar Incontrol Touch system and any similar products ("Product"). Defendant has infringed and continues to infringe the '723 Patent in violation of 35 U.S.C. § 271.

14. Regarding Claim 12, the Product is configured to receive a media file (e.g., music file) from a wireless mobile device (e.g., mobile phone) over a communication network (e.g. Bluetooth network). The wireless mobile device (e.g., mobile phone) sends data (e.g., music file) to the media system. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.



What Can You Do with Jaguar InControl Touch?

Drivers who are looking for superior performance that goes hand in hand with superior technology will love what the Jaguar brand has to offer. With a standard Jaguar InControl Touch multimedia interface, you will benefit from a standard eight-inch touchscreen display with touch and swipe controls, Bluetooth connectivity and a next-generation navigation system.

Available on-board Wi-Fi will allow up to eight wireless devices to stay connected to the internet and Jaguar InControl Apps will provide access to music, information and more. Jaguar InControl also provides an available Remote App for remote access and security. Learn how to connect to Jaguar InControl Touch via Bluetooth below.

Source: <https://www.jaguar.in/incontrol/incontrol-user-guide/incontrol-apps.html>

Source: <https://www.jaguarboerne.com/blog/how-to-pair-your-phone-with-jaguar-incontrol-touch-bluetooth/>

Source : <https://www.youtube.com/watch?v=zVtOcQ3iB-4>

15. The Product includes a wireless receiver (e.g., Bluetooth receiver). Certain aspects of this element are illustrated in the screenshots below and/or in those provided in connection with other allegations herein.

Step 1: Activate Bluetooth on Your Smartphone.
 Step 2: Turn Your Jaguar F-PACE On.
 Step 3: Tap "Touch to Connect Phone" on the Jaguar InControl Touchscreen.
 Step 4: Go To Bluetooth Settings On Your Phone — Search for New Devices.
 Step 5: Select Your Vehicle's Name.
 Step 6: Ensure Passkey Matches — Select "OK".
 Step 7: Smartphone Will Appear on Touchscreen Display.
 Step 8: Vehicle Will Now Automatically Connect to Your Phone.
 Step 9: Allow Vehicle Access to Contacts.
 Step 10: Press Phone Shortcut to Go to Phone Screen.



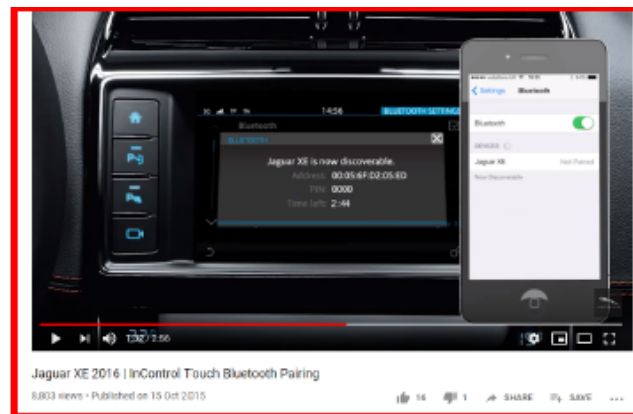
Step-By-Step Guide to Pair Your Smartphone with Jaguar InControl Touch

Source: <https://www.jaguarboerne.com/blog/how-to-pair-your-phone-with-jaguar-incontrol-touch-bluetooth/>

Source: <https://www.youtube.com/watch?v=zVtOcQ3iB-4>

16. The Product includes a security measure (e.g., Bluetooth PIN). Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

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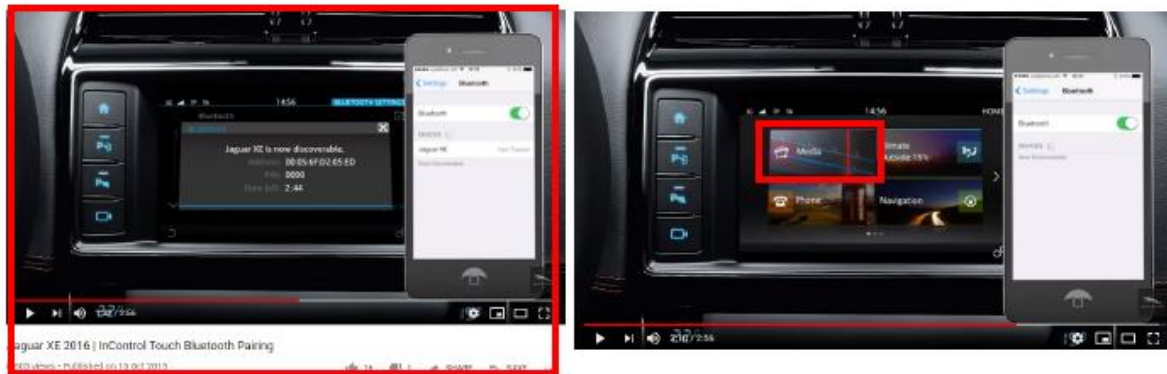


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17. The Product is disposed in an accessible relation to at least one interactive computer network (e.g., Bluetooth network) that has a wireless range structured to permit authorized access (e.g., via pairing code) to said at least one interactive computer network. Certain aspects of this element are illustrated in the screenshots below and/or those provided in

connection with other allegations herein.



Every time you come back to the car, it should automatically reconnect to the paired phone. However, this depends on the phone settings and handset compatibility. Please check the pairing and connection guide for details. The vehicle will automatically search for the last connected Bluetooth® phone when the ignition is switched on and no phone is attached to the cradle. If the last connected Bluetooth® phone is in range (and set to accept connections), the vehicle and phone will connect. If the last connected phone is not in range, the vehicle will search for the next phone on the device list.

Source: <https://www.youtube.com/watch?v=zVtOcQ3iB-4>

Source: <https://www.jaguar.com/incontrol-global/incontrol-user-guide/bluetooth-connectivity.html>

18. When the wireless mobile device is within the wireless range, the wireless mobile device is detectable by the media system (e.g., the media system automatically detects a smartphone when the mobile device is within Bluetooth range). Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.



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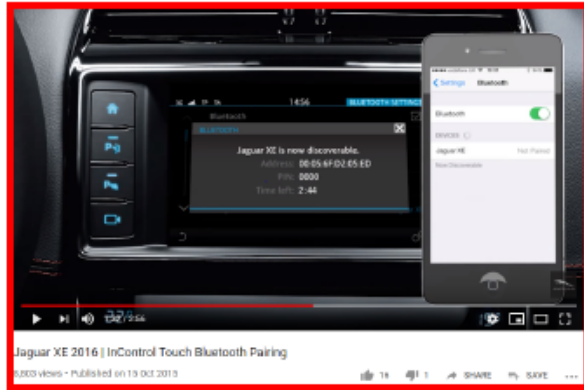
19. At least one digital media file (e.g., music file) is initially disposed on the wireless mobile device (e.g., the mobile phone includes one or more music files). Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.



Source: <https://www.youtube.com/watch?v=zVtOcQ3iB-4>

Source: <https://www.jaguar.in/incontrol/incontrol-user-guide/incontrol-apps.html>

20. The media system is structured to detect the wireless mobile device disposed within the wireless range (e.g., media system automatically detects the mobile phone when it is within Bluetooth range). Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

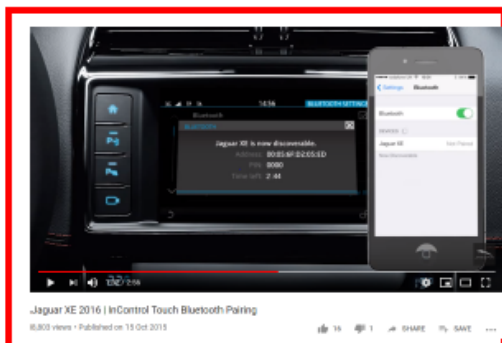


Every time you come back to the car, it should automatically reconnect to the paired phone. However, this depends on the phone settings and handset compatibility. Please check the pairing and connection guide for details. The vehicle will automatically search for the last connected Bluetooth® phone when the ignition is switched on and no phone is attached to the cradle. If the last connected Bluetooth® phone is in range (and set to accept connections), the vehicle and phone will connect. If the last connected phone is not in range, the vehicle will search for the next phone on the device list.

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21. A communication link (e.g., Bluetooth) is structured to dispose the media system and the wireless mobile device (e.g. mobile phone) in a communicative relation with one another via the at least one interactive computer network. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.



Step 1: Activate Bluetooth on Your Smartphone.

Step 2: Turn Your Jaguar F-PACE On.

Step 3: Tap "Touch to Connect Phone" on the Jaguar InControl Touchscreen.

Step 4: Go To Bluetooth Settings On Your Phone — Search for New Devices.

Step 5: Select Your Vehicle's Name.

Step 6: Ensure Passkey Matches — Select "OK".

Step 7: Smartphone Will Appear on Touchscreen Display.

Step 8: Vehicle Will Now Automatically Connect to Your Phone.

Step 9: Allow Vehicle Access to Contacts.

Step 10: Press Phone Shortcut to Go to Phone Screen.

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Source: <https://www.jaguarboerne.com/blog/how-to-pair-your-phone-with-jaguar-incontrol-touch-bluetooth/>

22. The communication link is initiated by the media system by tapping on “Touch to connect phone” on the display screen. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

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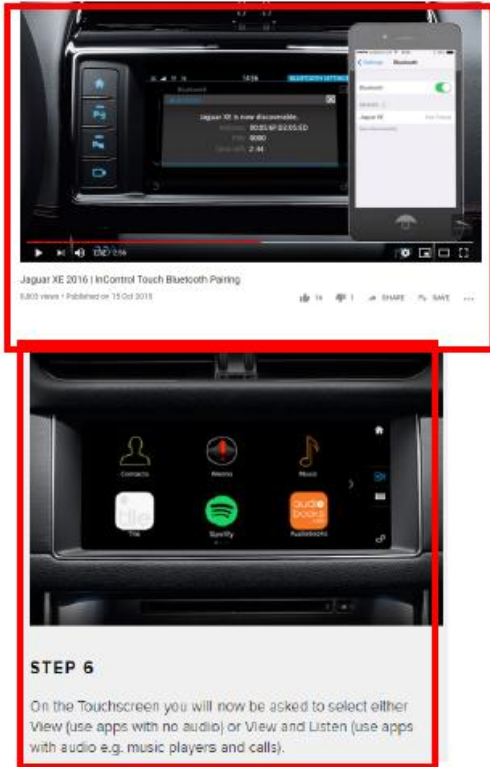
23. The wireless mobile device and the media system are structured to transmit the at least one digital media file there between via the communication link (e.g., media system allows for the transmission of files between itself and the wireless mobile device; e.g., the mobile device transmits the music file to the media system). Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.



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Source: <https://www.jaguar.in/incontrol/incontrol-user-guide/incontrol-apps.html>

24. The communication link is structured to bypass the security measure of the media system for a limited permissible use of the communication link by the wireless mobile device for only transferring the at least one digital media file to, and displaying the at least one digital media file on, the media system (e.g., the media system bypasses the security measure of the Bluetooth network). Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.



- Step 1:** Activate Bluetooth on Your Smartphone.
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25. Defendant's actions complained of herein will continue unless Defendant is enjoined by this court.

26. Defendant's actions complained of herein are causing irreparable harm and monetary damage to Plaintiff and will continue to do so unless and until Defendant is enjoined and restrained by this Court.

27. Plaintiff is in compliance with 35 U.S.C. § 287.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff asks the Court to:

(a) Enter judgment for Plaintiff on this Complaint on all causes of action asserted herein;

(b) Enter an Order enjoining Defendant, its agents, officers, servants, employees, attorneys, and all persons in active concert or participation with Defendant who receive notice of the order from further infringement of United States Patent No. 9,300,723 (or, in the alternative, awarding Plaintiff running royalties from the time of judgment going forward);

(c) Award Plaintiff damages resulting from Defendant's infringement in accordance with 35 U.S.C. § 284;

(d) Award Plaintiff pre-judgment and post-judgment interest and costs; and

(e) Award Plaintiff such further relief to which the Court finds Plaintiff entitled under law or equity.

Dated: February 23, 2020

Respectfully submitted,

/s/ Jimmy Chong

JIMMY CHONG, ESQ. (#4839)

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ATTORNEY FOR PLAINTIFF

EXHIBIT A